

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
PAUL D. RIDDLE  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Paul\_Riddle@fd.org

6 Attorney for Travis Schultz  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 TRAVIS SCHULTZ,  
15 Defendant.

Case No. 2:13-cr-00095-JCM-PAL

**STIPULATION TO CONTINUE  
DEADLINE TO SUPPLEMENT TO  
MOTION FOR COMPASSIONATE  
RELEASE  
(First Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
17 Trutanich, United States Attorney, and Elizabeth O. White, Assistant United States Attorney,  
18 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
19 and Paul D. Riddle, Assistant Federal Public Defender, counsel for Travis Schultz, that the  
20 Supplement to Motion for Compassionate Release deadline currently scheduled on October 30,  
21 2020, be vacated and continued to a date and time convenient to the Court, but no sooner than  
22 twenty-one (21) days.

23 This Stipulation is entered into for the following reasons:

24 1. Mr. Schultz will have exhausted his administrative remedies in approximately  
25 two weeks. Undersigned counsel wishes to wait until Mr. Schultz has exhausted his  
26 administrative remedies prior to filing the supplement to his motion in this case. Accordingly,

1 the parties agree that a three-week continuance is appropriate and respectfully request an  
2 extension of three weeks.

3 2. The defendant is in custody and agrees with the need for the continuance.

4 3. The parties agree to the continuance.

5 This is the first request for a continuance of the Compassionate Release Supplement.

6 DATED this 29<sup>th</sup> day of October, 2020.

7  
8 RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

9  
10 By /s/ Paul D. Riddle

By /s/ Elizabeth O. White

11 PAUL D. RIDDLE  
12 Assistant Federal Public Defender

ELIZABETH O. WHITE  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 TRAVIS SCHULTZ,

7 Defendant.  
8

Case No. 2:13-cr-00095-JCM-PAL

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the Compassionate Release Supplement deadline  
11 currently scheduled for Friday, October 30, 2020, be vacated and continued to  
12 November 20, 2020 by 5:00 p.m.

13 DATED October 30, 2020.

14  
15   
16 UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26